

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

**SHATTUCK BANCSHARES, INC.,
AND SNB BANK, N.A.**

Plaintiffs,

v.

Case No. 5:24-cv-00677-J

**ERIC HANNELIUS, MICHAEL
SHVARTSMAN, OKSANA MOORE,
KARLA KNIGHT, ELENA POPOVA,
JUSTIN SOULEN, BILL MY BNK,
LLC, BT ASSETS GROUP, INC., EFT
BUSINESS SERVICES, LLC,
ENCOMPAY, INC., HANNELIUS-
KNIGHT FAMILY TRUST, MG
FAMILY TRUST, ONE PAY CLOUD,
LLC, OST, LLC, PEPPER PAY, LLC,
ROCKET HOLDINGS, LLC, SALT
MONEY, INC., SKYLIGHT BUSINESS
SERVICES, LLC, TRANSACT FIRST,
INC., AND TRANSACTION
PROCESSING SERVICES, INC.,**

Defendants.

DECLARATION OF OKSANA MOORE

I, Oksana Moore, of lawful age and sound mind do swear, under penalty of perjury pursuant to the laws of the state of Florida, to the following:

1. I have personal knowledge of the facts set forth herein.
2. I am a Defendant in the above-captioned matter.
3. I have reviewed the Affidavit of Service from process server Roy Miller attached hereto as Exhibit A.
4. Mr. Miller makes several false statements in his Affidavit.
5. First, Mr. Miller claims that my Unit has 2 doors. It only has 1 door.

6. Second, Mr. Miller claims that he knocked on my door on June 15, 2024 at 11:14 a.m., and that I opened the door and then shut the door when he told me he was serving documents on me. This is not true.

7. I was at a Chiropractor appointment with my 2 minor children on Saturday June 15, 2024 at 11:00 a.m.

8. Exhibit B to this Declaration is a series of text messages with my Chiropractor's Office discussing my family's appointment at 10 a.m. on June 15, 2024. As explained in the texts, I moved the appointment to 11 a.m. because I had trouble getting my son out of bed.

9. In order to get the appointment by 11:00 a.m., we left our apartment at around 10:00 a.m.

10. The appointment lasted at least two hours. Exhibit C is a screenshot of my Zelle payments to my Chiropractor which show my payment for this June 15, 2024 visit.

11. After our appointment, I took my kids out to lunch at the Family fresh Café, followed by a trip to the Granier Bakery. Exhibit D is a Screenshot from my Discover Card online access showing my payments for these 2 visits.

12. We did not return home until after 3 p.m. There was no one else at my apartment during this time.

13. Additionally, I do not believe that Oklahoma has personal jurisdiction over me.

14. I have never done business in Oklahoma and I have never even been to Oklahoma.

15. To the extent I had any communications with Plaintiff, SNB Bank or signed any documents for SNB Bank, I did so from my place of employment in Miami, Florida and I did so solely in my capacity as an employee of one of the corporate Defendants in this matter.

I declare under penalty of perjury the foregoing is true and correct.

Executed this 10th day of July, 2024.

A handwritten signature in black ink, appearing to be "J. Blum", written over a horizontal line.

EXHIBIT A

IN THE DISTRICT COURT OF ELLIS COUNTY, STATE OF OKLAHOMA

SNB BANK, N.A.; SHATTUCK BANCSHARES, INC.

Plaintiff(s) / Petitioner(s)

v.

**TRANSACT FIRST, INC., TRANSACTION PROCESSING
SERVICES, INC., ERIC HANNELIUS, MICHAEL
SHVARTSMAN, OKSANA MOORE, KARLA KNIGHT,
ELENA POPOVA, JUSTIN SOULEN, BILL MY BNK, LLC,
BT ASSETS GROUP, INC., EFT BUSINESS SERVICES,
LLC, ENCOMPAY, INC., HANNELIUS-KNIGHT FAMILY
TRUST, MG FAMILY TRUST, ONE PAY CLOUD, LLC,
OST, LLC, PEPPER PAY, LLC, ROCKET HOLDINGS, LLC,
SALT MONEY, INC., SKYLIGHT BUSINESS SERVICES,
LLC**

Case No.: CJ-2024-9

Defendant(s) / Respondent(s)

AFFIDAVIT OF SERVICE

I, Roy Miller, state:

I am 18 years or older and not a party to this action or a member of a corporation or organization that is a party to this action.

I served the following documents to Oksana Moore in Miami-Dade County, FL on June 15, 2024 at 11:14 am at 250 174th St, Apt 2004, Sunny Isles Beach, FL 33160 by refusal service by identifying the following documents, offering to deliver them to a person identified to me as Oksana Moore who refused service, and then leaving the documents in a conspicuous place.

Petition
Summons
Exhibits

Additional Description:

Confirmed with neighbor that she lives there. Unit has 2 doors. The woman opened the door a bit. I told her I had a delivery, court documents, and she shut the door. I announced that I was leaving them at the front door and that she had been served.

White Female, est. age 45-54, glasses: N, Blonde hair, 140 lbs to 160 lbs, 5' 6" to 5' 9".

Geolocation of Serve: <https://google.com/maps?q=25.9369614666,-80.1276381562>

Photograph: See Exhibit 1

Total Cost: \$156.70

I state under penalty of perjury under the laws of Oklahoma that the foregoing is true and correct.

Executed in

Miami-Dade County,

FL on 6/19/2024.

/s/ Roy Miller

Signature

Roy Miller

+1 (786) 327-4973

Exhibit 1a)

2004



Exhibit 1b)



EXHIBIT B

4:00



Krysa >



when me and kids come ?

Yes! And your mom too.

Do you want your mom to come with you so she can see it first?

Yes ;)

When we have our appointment?

Ok 👍 yes 👍

If that works for you.

When is our appointment? What date

Saturday the 15th

Great. 👍

Let's do mom Thursday 20 th 10 am ?

Great! 👍

Sat, Jun 15 at 8:16 AM

See you at 10!
933 SW 19th fort Lauderdale [33315](#)

Sat, Jun 15 at 9:17 AM

Hi can we do 11
It doesn't look that I am able to wake up Gabriel

iMessage



EXHIBIT C

4:01



Past Payments



CABLEKRYSSA
Registered as KRYSSA CABLE FAMILY
CHIROPRACTIC, INC, FORT LAUDERDALE, FL
(310) 463-0006

See when you last sent money to this recipient.

Jul 03, 2024		
Completed		\$250.00
Jun 20, 2024		
Completed		\$215.00
Jun 15, 2024		
Completed		\$360.00
Jun 06, 2024		
Completed		\$180.00
May 25, 2024		
Completed		\$360.00
May 21, 2024		
Completed		\$215.00
May 14, 2024		
Completed		\$235.00
May 07, 2024		
Completed		\$180.00
May 04, 2024		
Completed		\$360.00

EXHIBIT D



OKSANA MOORE
Acct. Ending 1371
250 174TH ST APT 2004, SUNNY ISL BCH, FL, 33160-5386
[\(786\)274-0917](tel:(786)274-0917)

Transaction Details

Trans. Date	Description	Amount	Category
06/15/24	TST* FAMILY FRESH SUNNY ISLES BFL 00104365018310350339AA	\$ 84.02	Restaurants

TST*TST* FAMILY FRESH

18288 Collins Ave 2, FL 33160

Post Date	Saturday, June 15, 2024
Transaction Date	Saturday, June 15, 2024
Merchant Category	EATING PLACES AND RESTAURANTS
Purchase Method	RADIO FREQUENCY IDENTIFICATION
Buyer Name	OKSANA MOORE

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OKSANA MOORE
Acct. Ending 1371
250 174TH ST APT 2004, SUNNY ISL BCH, FL, 33160-5386
[\(786\)274-0917](tel:(786)274-0917)


Transaction Details

Trans. Date	Description	Amount	Category
06/15/24	GRANIER BAKERY SUNNY SUNNY ISLES FL	\$ 63.00	Restaurants

GRANIER BAKERY SUNNY

18230 COLLINS AVE, FL 33160

[\(305\) 974 - 0469](tel:(305)974-0469)

Post Date	Saturday, June 15, 2024
Transaction Date	Saturday, June 15, 2024
Merchant Category	EATING PLACES AND RESTAURANTS
Purchase Method	INTEGRATED CIRCUIT CARD READER
Buyer Name	OKSANA MOORE
Card Used	
Point Of Sale Zip Code	33160
Phone Number	3059740469
Merchant Url Text	ALVARO.POTES@ON.C

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